

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,)	CIVIL NO.04-00502 DAE BMK
a Hawai'i, nonprofit corporation;)	
NA IMI PONO, a Hawaii)	DECLARATION OF MAJOR GENERAL
unincorporated association; and)	DANA T. ATKINS
KIPUKA, a Hawai'i unincorporated)	
association,)	
)	
Plaintiffs,)	
)	
v.)	
)	
DONALD H. RUMSFELD, Secretary of)	
United States Department of)	Hearing:
Defense; and LES BROWNLEE, Acting)	
Secretary of the United States)	Date: November 20, 2006
Department of the Army,)	Time: 9:45
)	Judge: Hon. David A. Ezra
Defendants.)	

DECLARATION OF MAJOR GENERAL DANA T. ATKINS

I, Major General Dana T. Atkins, hereby declare that:

1. I am currently the Director of Operations, United States Pacific Command (hereinafter "USPACOM"). In this capacity, I direct and supervise all aspects of military deployments and operations throughout the USPACOM Area of Responsibility to deter aggression, advance regional security cooperation, and promote stability in the Asia-Pacific region. In the event of crisis or conflict, I am responsible for the movement and

employment of forces in support of U.S. military response options throughout the Asia-Pacific region. The USPACOM Area of Responsibility, encompassing 43 countries, 51 percent of the earth's surface, 60 percent of the world's population, and the world's six largest armed forces, poses continual and dynamic challenges to the security of the United States. When necessary, USPACOM must respond to crises and be prepared to prevail in support of U.S. security objectives. Success requires a constant, proactive, coordinated effort by the full complement of joint military forces assigned to USPACOM. Success in deterring conflict depends in large part on the known and visible force presence being factored by potential adversaries. Ongoing North Korea missile and nuclear testing should validate the need for vigilant and real capabilities. It is my personal judgment that disrupting the transformation of the 2nd Brigade, 25th Infantry Division (Light) ("2nd Brigade") to a Stryker Brigade Combat Team ("SBCT 5"), and/or relocating SBCT 5 from Hawaii, would immediately and unacceptably undermine the ability of USPACOM to deter conflict and respond to crisis situations throughout the Asia-Pacific region.

2. I have served on active duty in the U.S. Air Force for over 34 years. In previous assignments, I served in command and staff positions throughout the globe, to include Europe, Japan

and Korea. I have observed first hand the influence of credible, ready forces in supporting an environment of stability and security. I have observed the cost and destruction of war and know the value of peace, and its guardians. I have completed a master's degree in aeronautical science from Embry-Riddle Aeronautical University, and a master's degree in national security strategy from the National War College.

3. Delaying the transformation of 2nd Brigade to SBCT 5 will have significant, negative effects on USPACOM operations throughout the Pacific region. First, Hawaii is the critical strategic location in the USPACOM Area of Responsibility for U.S. Army forces. No other location in the USPACOM Area of Responsibility or western United States offers anything near equivalent to the marriage of deployable combat capability, available strategic lift, and strategic positioning for readiness and deployment. Time and distance factors of the Pacific unavoidably complicate all aspects of contingency planning, force movement, and deployment timelines. Hawaii's central position in the Area of Responsibility makes it the optimal location for responsive forces due to both rapid deployment times and simplified logistical solutions resulting from the collocation of airlift, sealift, and forces. Deploying similar combat power from Alaska or the West Coast of the United

States nearly always delays the closure of critical forces due to distance and the time required to relocate strategic lift assets. Additionally, Hawaii's weather provides excellent conditions for linking ground forces with lift assets. Severe cold, low visibility, and frequent precipitation in Alaska and along the West Coast, routinely delay force movements.

4. Second, rapid force deployment is essential for responding quickly to theater crises, preventing crisis escalation, and assuring regional partners. The USPACOM Area of Responsibility is subject to frequent and severe natural disasters, including super-typhoons, earthquakes, tsunamis, volcanic eruptions, and mudslides. Due to population densities in the Asia-Pacific littoral regions, such disasters commonly kill, injure, or displace thousands of people. The South Asia tsunami of 2004 killed nearly 200,000 people. Regional governments and populations look to the United States and USPACOM to provide relief and assistance in the aftermath of these catastrophes. Prompt U.S. intervention and assistance is essential to saving lives, mitigating human suffering, and preventing property loss. More often than not, USPACOM military forces are the only U.S. government elements with the capability to both reach the affected areas and render assistance. Historically, these missions have been pivotal to maintaining regional goodwill

toward the United States and ensuring continued U.S. government and military access to strategically important regions. The window of opportunity for an effective USPACOM response is often brief and fleeting with added risk to the loss of life. Failure to respond promptly squanders regional engagement opportunities and fosters perceptions of U.S. indifference that may take years to erase.

5. Third, robust economic growth in the Pacific Rim has caused large numbers of American citizens to take up residence in or travel throughout the USPACOM Area of Responsibility. In the event political instability or regional threats require evacuation of these citizens to safety, USPACOM bears the primary responsibility for assisting Department of State with noncombatant evacuations. Typically, political situations destabilize quickly and require rapid, credible intervention by military forces. USPACOM also has contingency plans to deploy forces to protect vulnerable U.S. infrastructure, threatened by foreign instability or hostile forces.

6. Foreign humanitarian assistance, noncombatant evacuations, and critical infrastructure protection all require forward positioned, rapidly deployable, and fully-trained military forces. To this end, USPACOM maintains standing contingency response forces designed to quickly deploy in times of crisis to

prevent loss of life and human suffering. Humanitarian assistance and disaster relief operations following the Leyte, Philippine mudslides and the recent Indonesian earthquake are but two examples of this continuing requirement. Contingency deployments seldom require an entire brigade, but always require the greatest amount of capability in the shortest amount of time. No other USPACOM force provides the firepower, mobility, situational awareness, and information processing capabilities resident in a SBCT. 2nd Brigade must transform as planned to meet USPACOM mission requirements and response timelines and to enhance the strategic flexibility of the United States within the theater.

7. Fourth, rapid force deployment requires collocation of SBCT 5 and C-17 Globemaster airlift. During the 2004 Joint Staff integrated priority list process, USPACOM identified a requirement for two SBCTs to fill a USPACOM capability shortfall, directly inhibiting the USPACOM ability to meet SECDEF-directed combat obligations. SECDEF ranked this requirement, in conjunction with the strategic airlift requirement to move the SBCT units, as the sixth highest U.S. defense priority. Pairing SBCT units with C-17 aircraft provides the air mobility essential to begin overcoming this shortfall and reduces response timelines for first responders.

The C-17/SBCT combination is absolutely crucial and is designed to project the greatest possible military capability with the minimum amount of lift in the fastest time possible.

Consequently, any delay or relocation of SBCT 5 transformation will directly impede USPACOM ability to respond effectively to theater contingencies.

8. Finally, the Commander, United States Pacific Command, and Commander, United States Forces Korea have specifically identified the criticality of SBCT units to fulfilling SECDEF-directed mission and contingency requirements in the Pacific and Korea theaters. As a result, the Secretary of the Army identified 2nd Brigade for transformation in July 2001. Delaying 2nd Brigade's transformation to SBCT 5 will unnecessarily degrade military readiness and waste resources currently designated for the transformation of the seventh SBCT.

9. I respectfully submit the 2nd Brigade transformation to SBCT 5 must remain on schedule in Hawaii to prevent unacceptable degradation of resources and capabilities required for USPACOM to deter conflict and effectively respond to security challenges and humanitarian crises in the USPACOM Area of Responsibility.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dana T. Atkins

MAJOR GENERAL DANA T. ATKINS

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DATE